

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE

SOR MILAGROS PEREZ SOTO

DEBTOR(S)

CASE NO: 14-09083 MCF

CHAPTER 13

STIPULATION

TO THE HONORABLE COURT:

COME NOW, SOR MILAGROS PEREZ SOTO, debtor; and DLJ MORTGAGE CAPITAL (from now on DLJ), through its servicer SELECT PORTFOLIO SERVICING INC. (from now on SPS) creditor in the above captioned case, through their respective attorneys, and very respectfully state and pray as follows:

1. Debtor filed the instant case on October 31st, 2014.
2. DLJ Mortgage Capital filed a Motion for Relief from the Automatic Stay alleging \$3,532.52 in post-petition arrears. See docket no. 25
3. As of June 26th, 2017 Debtor owes \$3,646.15 in post-petition arrears.
3. In consideration of mutual covenants and undertaking set forth herein and intending to be legally bound hereby, the parties agree as follows:
 - a. Creditor will amend its Proof of Claim (Claim No. 9) in order to include all post-petition arrears as June 26, 2017.
 - b. Debtor will amend his chapter 13 plan to increase her plan base in order to include all post-petition arrears with DLJ as of the date of the filing of this stipulation.
 - c. Debtor will continue to make all direct payments to DLJ beginning on July 1st 2017.
 - d. This stipulation is conditioned on having no objections by the Chapter 13 trustee.

4. The stay will continue in full effect as long as Debtor remains current with his post-petition payment obligations with DLJ.

WHEREFORE, the appearing parties respectfully request from this Honorable Court to take notice of the above and grant the stipulation filed by the parties.

NOTICE

Notice is hereby given that a Stipulation has been filed by debtor and creditor DLJ Mortgage Capital.

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerks office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may schedule a hearing.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date of filing a copy of this motion has been forwarded to every creditor in the master list address that do not have electronic filing records and for those who have the Notification has been made by means of the CM/ECF System, including the Chapter 13 Trustee and the U.S. Trustee for the District of Puerto Rico.

In San Juan, Puerto Rico, this 26th day of June of 2017.

<p>/s/ ALEJANDRO G. MARTINEZ MALDONADO USDC NO: 302208 COUSEL FOR DLJ MORTGAGE CAPITAL, INC.</p> <p>LATIMER, BIAGGI, RACHID & GODREAU, LLP PO BOX 9022512 SAN JUAN, PR 00902 TEL: (787)- 724-0230 FAX: (787) 725-1210 EMAIL: amartinez@lbrglaw.com</p>	<p>/s/ EDWIN MATOS MALDONADO USDC: 226403 COUNSEL FOR DEBTOR</p> <p>BUFFETE LEGAL ZENO GLORO LLC PO BOX 1945 ARECIBO PR 00614 TEL: (787) 879-1760 EMAIL: tribunal@zenogloro.com</p>
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